

Joseph R. Saveri (admitted *pro hac vice*)  
Joshua P. Davis (admitted *pro hac vice*)  
Kevin E. Rayhill (admitted *pro hac vice*)  
Jiamin Chen (admitted *pro hac vice*)  
**JOSEPH SAVERI LAW FIRM, INC.**  
601 California Street, Suite 1000  
San Francisco, California 94108  
Phone: (415) 500-6800  
Fax: (415) 395-9940  
[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)  
[jdavis@saverilawfirm.com](mailto:jdavis@saverilawfirm.com)  
[krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)  
[jchen@saverilawfirm.com](mailto:jchen@saverilawfirm.com)

*Co-Lead Counsel for the Classes and  
Attorneys for Individual and Representative Plaintiffs  
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,  
Brandon Vera, and Kyle Kingsbury*

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated,

## Plaintiffs,

VS.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

**Defendant.**

Case No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF KEVIN E. RAYHILL  
IN SUPPORT OF PLAINTIFFS' AND  
DEFENDANT ZUFFA, LLC'S JOINT  
MOTION REGARDING ZUFFA, LLC'S  
MOTION TO SEAL ZUFFA, LLC'S  
REPLY IN SUPPORT OF ZUFFA, LLC'S  
MOTION TO SEAL PLAINTIFFS'  
REPLY IN SUPPORT OF PLAINTIFFS'  
MOTION TO CERTIFY CLASS AND  
RELATED MATERIALS**

1 I, Kevin E. Rayhill, declare and state as follows:

2       1. I am an attorney at the Joseph Saveri Law Firm, Inc., Co-Lead Counsel for the Classes  
3 and Attorneys for Individual and Representative Plaintiffs. I am a member in good standing of the State  
4 Bar of California, and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have  
5 personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would  
6 testify competently to them.

7       2. I make this Declaration in support of Plaintiffs' and Defendant Zuffa, LLC's Joint  
8 Motion Regarding Zuffa, LLC's Reply in Support of Zuffa, LLC's Motion to Seal Plaintiffs' Reply in  
9 Support of Plaintiffs' Motion to Certify Class and Related Materials (the "Joint Motion").

10      3. Attached hereto as Exhibit 1 is a true and correct copy of a Wikipedia article entitled  
11 "UFC 145." This article contains purse information for UFC 145, which took place on April 21, 2012.  
12 Ben Rothwell is reported to have made \$104,000, including a \$52,000 win bonus. This article was  
13 downloaded from the internet at my direction on June 29, 2018, and is available for download at  
14 [https://en.wikipedia.org/wiki/UFC\\_145](https://en.wikipedia.org/wiki/UFC_145).

15      4. Attached hereto as Exhibit 2 is a true and correct copy of a Wikipedia article entitled  
16 "UFC 164." This article contains purse information for UFC 164, which took place on August 31. 2013.  
17 Ben Rothwell is reported to have made \$108,000, including a \$54,000 win bonus. This article was  
18 downloaded from the internet at my direction on June 29, 2018, and is available for download at  
19 [https://en.wikipedia.org/wiki/UFC\\_164](https://en.wikipedia.org/wiki/UFC_164).

20      5. Attached hereto as Exhibit 3 is a true and correct copy of a Wikipedia article entitled  
21 "UFC 209." This article contains purse information for UFC 209, which took place on March 4, 2017.  
22 Allistair Overeem is reported to have made \$750,000, with no win bonus. This article was downloaded  
23 from the internet at my direction on June 29, 2018, and is available for download at  
24 [https://en.wikipedia.org/wiki/UFC\\_209](https://en.wikipedia.org/wiki/UFC_209).

25      6. Attached hereto as Exhibit 4 is a true and correct copy of a Wikipedia article entitled  
26 "UFC 213." This article contains purse information for UFC 213, which took place on July 8, 2017.  
27 Allistair Overeem is reported to have made \$800,000, with no win bonus. This article was downloaded  
28

1 from the internet at my direction on June 29, 2018, and is available for download at  
2 [https://en.wikipedia.org/wiki/UFC\\_213](https://en.wikipedia.org/wiki/UFC_213).

3 7. On June 29, 2018, I instructed a paralegal working under my direction to investigate  
4 whether fighter purse information was published on the internet for every UFC event held in each of the  
5 states known to release purse information (Arizona, California, Florida, Georgia, Massachusetts,  
6 Nevada, New Mexico, Ohio, Virginia, Washington, and Wisconsin), since Zuffa acquired the UFC in  
7 January, 2001. The paralegal personally viewed a webpage for each of those events that reported fighter  
8 purse information released by the relevant regulatory authority in each state. The paralegal confirmed  
9 that fighter purse information is available on the internet for 179 of the 409 UFC events that have taken  
10 place since January 2001.

11  
12 I declare under penalty of perjury and the laws of the United States that the foregoing is true and  
13 correct and this Declaration is executed in San Francisco, California on June 29, 2018.

14  
15 By: /s/Kevin E. Rayhill  
16 Kevin E. Rayhill  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28